

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

DAVID SIDOO, *et al.*,

Defendants.

Case No. 19-cr-10080-NMG

**DEFENDANTS’ UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR
THEIR RESPONSE TO THE GOVERNMENT’S SUR-REPLY IN OPPOSITION TO
DEFENDANTS’ MOTION REGARDING GOVERNMENTAL MISCONDUCT**

Defendants¹ respectfully request an extension of the page limit—by two pages—for their response to the Government’s sur-reply in opposition to their motion regarding governmental misconduct (ECF No. 971). Defendants seek two extra pages so that they can properly respond to the Government’s sur-reply and the six exhibits it filed with that sur-reply (ECF Nos. 1104 to 1104-6).

1. On April 17, 2020, this Court ordered that Defendants were permitted to submit a five-page response to the Government’s ten-page sur-reply on or before May 1, 2020. ECF No. 1085 at 3.

2. On April 24, 2020, the Government filed its sur-reply and six exhibits. *See* ECF Nos. 1104 to 1104-6. With the exhibits, the Government’s filing spans 49 pages. *See id.*

3. To properly respond to the Government’s filing—which contains extensive factual material not contained in its opposition—Defendants seek permission to file a seven-page, rather

¹ Counsel for Defendants Gamal Abdelaziz, Diane Blake, Todd Blake, I-Hsen “Joey” Chen, Amy Colburn, Gregory Colburn, Elisabeth Kimmel, William McGlashan, Jr., Marci Palatella, John Wilson, Robert Zangrillo, and Homayoun Zadeh have indicated to undersigned counsel that they join in the relief requested in this motion.

than a five-page, response. Defendants recognize that the briefing on their misconduct motion has already been voluminous, and Defendants would not make this request if they did not believe the additional two pages were necessary to properly respond to the Government's submission and for Defendants' response to be helpful to the Court.

4. Undersigned counsel has conferred with counsel for the Government about this request. The Government does not oppose Defendants' request.

Defendants thus respectfully request that the Court grant this motion and permit them to file a seven-page response to the Government's sur-reply.

Dated: April 30, 2020

Respectfully submitted,

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Counsel for Mossimo Giannulli and Lori Loughlin

LOCAL RULE 7.1(a)(2) CERTIFICATION

I certify that I conferred with counsel for the Government in an attempt to resolve or narrow the issues raised in this motion. The Government does not oppose this motion.

/s/ William J. Trach
William J. Trach

CERTIFICATE OF SERVICE

I certify that this document was filed with the Court through the CM/ECF system, that notice will be sent electronically to all registered participants as identified on the Notice of Electronic Filing, and that paper copies will be sent to those identified as non-registered participants.

/s/ William J. Trach
William J. Trach